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FILED

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Clerk, U.S. District Court
District Of Montana
Great Falls

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

UNITED STATES OF AMERICA,	CR 22- <i>22</i> -GF-BMM
Plaintiff,	INDICTMENT
vs.	CONSPIRACY TO COMMIT WIRE FRAUD (Count I) Title 18 U.S.C. § 1349 (Penalty: 20 years of imprisonment, \$250,000 fine, and three years of supervised release)
JOHN BRENDAN DAILEY, and CRYSTAL LYNN JACKSON, <i>aka Crystal Lynn Barber</i> ,	WIRE FRAUD (Counts II-X) Title 18 U.S.C. §§ 2 and 1343 (Penalty: 20 years of imprisonment, \$250,000 fine, and three years of supervised release)
Defendants.	

	AGGRAVATED IDENTITY THEFT (Counts XI-XIX) Title 18 U.S.C. §§ 2 and 1028A(a)(1), (Penalty: Mandatory minimum two years of imprisonment, consecutive to any other punishment, \$250,000 fine, and one year of supervised release)
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THE GRAND JURY CHARGES:

COUNT I
WIRE FRAUD CONSPIRACY

Beginning in approximately September 2019, and continuing until approximately May 2020, at Great Falls, within Cascade County, and at Havre, within Hill County, and elsewhere in the State and District of Montana, the defendants, JOHN BRENDA DAILEY and CRYSTAL LYNN JACKSON, *aka* *Crystal Lynn Barber*, did knowingly combine, conspire, confederate and agree, with each other and with others, known and unknown to the Grand Jury, to commit the following offense against the United States: to devise a scheme and artifice for obtaining money by means of material false and fraudulent pretenses and representations, and thereafter to execute the scheme and artifice so devised, to transmit or cause to be transmitted by wire communications in interstate commerce certain signals, writings and sounds, in violation of 18 U.S.C. § 1343, all in violation of 18 U.S.C. § 1349.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the object of the conspiracy was to be accomplished included the following:

1. It was part of the conspiracy that the defendants and other co-conspirators would steal mail and other personal property from several victims in Cascade County and elsewhere.
2. It was further part of the conspiracy that the defendants and other co-conspirators would alter checks belonging to and intended for those victims, and cash and deposit those checks at financial institutions and various businesses.
3. It was further part of the conspiracy that the defendants and other co-conspirators would make fraudulent identification cards to assume the identities of the victims so that they could pass the stolen and altered checks to make purchases at various businesses.

COUNTS II-X WIRE FRAUD THE SCHEME TO DEFRAUD

Beginning in approximately September 2019, and continuing until approximately May 2020, at Great Falls, within Cascade County, and at Havre, within Hill County, in the State and District of Montana, and elsewhere, the defendants, JOHN BRENDA DAILEY and CRYSTAL LYNN JACKSON, *aka* *Crystal Lynn Barber*, executed a material scheme and artifice to defraud, and for

obtaining money by means of material false and fraudulent pretenses and representations, in that they cashed, and attempted to cash, stolen and altered checks at various banks and businesses, using stolen identities, and in doing so caused wire communications to be transmitted in interstate commerce.

INTERSTATE WIRES

On or about the dates in the table below, at the locations listed below, in the State and District of Montana, the defendants, JOHN BRENDA DAILEY and CRYSTAL LYNN JACKSON, *aka Crystal Lynn Barber*, for the purpose of executing the aforementioned material scheme and artifice to defraud, and for obtaining money by means of material false and fraudulent pretenses and representations, did knowingly cause to be transmitted in interstate commerce wire communications between financial institutions in Montana and institutions in other states, which represented the cashing of stolen checks, in the amounts listed in the table below, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1343.

Count	Date	Defendant(s)	Transaction	Amount
II	12/21/2019	Dailey	Cashed Jane Doe 2's stolen/ altered check at Ace Hardware in Great Falls	\$697.73
III	12/26/2019	Dailey	Cashed Jane Doe 2's stolen/ altered check at Mountain View Co-Op in Great Falls	\$215.34

Count	Date	Defendant(s)	Transaction	Amount
IV	01/31/2020	Jackson <i>aka</i> <i>Barber</i>	Cashed stolen/altered check with John Doe 3's and Jane Doe 3's account number and Jane Doe 4's name at Town Pump in Great Falls	\$272.96
V	01/20/2020	Dailey, and Jackson <i>aka</i> <i>Barber</i>	Cashed John Doe 2's stolen/altered check at Town Pump in Great Falls	\$150.17
VI	01/21/2020	Dailey	Cashed John Doe 2's stolen/altered check at IGA Store in Havre	\$538.80
VII	02/03/2020	Jackson <i>aka</i> <i>Barber</i>	Cashed stolen/altered check with John Doe 3's and Jane Doe 3's account number and Jane Doe 4's name at Walmart in Great Falls	\$443.76
VIII	02/04/2020	Jackson <i>aka</i> <i>Barber</i>	Cashed stolen/altered check with John Doe 3's and Jane Doe 3's account number and Jane Doe 4's name at Scheels in Great Falls	\$1164.36
IX	02/24/2020	Jackson <i>aka</i> <i>Barber</i>	Cashed Jane Doe 5's stolen/altered check at North 40 Outfitters in Great Falls	\$1187.13
X	04/05/2020	Jackson <i>aka</i> <i>Barber</i>	Cashed Jane Doe 6's stolen/altered check at Flying J in Great Falls	\$242.53

COUNT XI
AGGRAVATED IDENTITY THEFT

On or about December 21, 2019, at Great Falls, within Cascade County, in the State and District of Montana, the defendant, JOHN BRENDAN DAILEY, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1343, wire fraud,

as charged in count II, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

COUNT XII
AGGRAVATED IDENTITY THEFT

On or about December 26, 2019, at Great Falls, within Cascade County, in the State and District of Montana, the defendant, JOHN BRENDA DAILEY, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1343, wire fraud, as charged in count III, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

COUNT XIII
AGGRAVATED IDENTITY THEFT

On or about January 31, 2020, at Great Falls, within Cascade County, in the State and District of Montana, the defendant, CRYSTAL LYNN JACKSON *aka* *Crystal Lynn Barber*, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1343, wire fraud, as charged in count IV, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

COUNT XIV
AGGRAVATED IDENTITY THEFT

On or about January 20, 2020, at Great Falls, within Cascade County, in the State and District of Montana, the defendants, JOHN BRENDAN DAILEY, and CRYSTAL LYNN JACKSON, *aka Crystal Lynn Barber*, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1343, wire fraud, as charged in count V, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

COUNT XV
AGGRAVATED IDENTITY THEFT

On or about January 21, 2020, at Havre, within Hill County, in the State and District of Montana, the defendant, JOHN BRENDAN DAILEY, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1343, wire fraud, as charged in count VI, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

COUNT XVI
AGGRAVATED IDENTITY THEFT

On or about February 3, 2020, at Great Falls, within Cascade County, in the State and District of Montana, the defendant, CRYSTAL LYNN JACKSON, *aka Crystal Lynn Barber*, did knowingly use, without lawful authority, a means of

identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1343, wire fraud, as charged in count VII, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

COUNT XVII
AGGRAVATED IDENTITY THEFT

On or about February 4, 2020, at Great Falls, within Cascade County, in the State and District of Montana, the defendant, CRYSTAL LYNN JACKSON, *aka Crystal Lynn Barber*, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1343, wire fraud, as charged in count VIII, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

COUNT XVIII
AGGRAVATED IDENTITY THEFT

On or about February 24, 2020, at Great Falls, within Cascade County, in the State and District of Montana, the defendant, CRYSTAL LYNN JACKSON, *aka Crystal Lynn Barber*, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1343, wire fraud, as charged in count IX, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

COUNT XIX
AGGRAVATED IDENTITY THEFT

On or about April 5, 2020, at Great Falls, within Cascade County, in the State and District of Montana, the defendant, CRYSTAL LYNN JACKSON, *aka Crystal Lynn Barber*, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1343, wire fraud, as charged in count X, and aided and abetted the same, in violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON


LEIF M. JOHNSON
United States Attorney


JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney